



AUSA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

v.

Sarai LOPEZ-Dojaquez,
Defendant.

Magistrate Case No.: '08 MJ 8308
COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about April 7, 2008, within the Southern District of California, defendant Sarai LOPEZ-Dojaquez did knowingly and intentionally import approximately 11.16 kilograms (24.55 pounds) of cocaine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


Lonnie Brasby, Special Agent
U.S. Immigration & Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 8TH
DAY OF APRIL 2008.


PETER C. LEWIS
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Sarai LOPEZ-Dojaquez.

4 STATEMENT OF FACTS

5 This Statement of Facts is based on the reports, documents, and notes
6 furnished to U. S. Immigration and Customs Enforcement Special Agent Ryan
7 Preciado.

8 On April 7, 2008, at approximately 1035 hours, Sarai LOPEZ-Dojaquez (LOPEZ)
9 entered the United States at the Calexico, CA, West Port of Entry. LOPEZ was the sole
10 occupant and registered owner of a 2006 Volkswagen Bora.

11 At primary inspection, LOPEZ gave a negative Customs Declaration and stated
12 she was going shopping at Wal-Mart. LOPEZ also told Customs and Border Protection
13 Primary Officer (CBPO) L. Parker that she was the registered owner of the Volkswagen.
14 CBPO Parker referred LOPEZ to the secondary lot for a more intensive inspection.

15 In the secondary lot CBPO Duarte assumed inspection of the Volkswagen and
16 LOPEZ. CBPO Duarte requested Canine Enforcement Officer (CEO) Navarro utilize
17 his Narcotics Detection Dog (NDD) Carlie CE-10 on the Volkswagen. CEO Navarro
18 notified CBPO Duarte of a positive alert to the dash area. CBPO Duarte along with
19 CEO Navarro conducted an intensive inspection of the dash area revealing a non-
20 factory compartment. CEO Navarro utilized a drill on the non-factory compartment
21 revealing a white powdery substance, which field-tested presumptive positive for
22 cocaine. A total of twelve (12) packages were removed with an approximate weight of
23 11.16 kgs (24.55 pounds).

24 LOPEZ was advised of her rights per Miranda. LOPEZ stated she understood
25 her rights and was willing to answer questions without the presence of an attorney.
26 LOPEZ stated she was going to be paid \$2,000.00 for smuggling narcotics into the
27 United States.
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